

Victorino DLG. Torres, Esq.
TORRES BROTHERS, LLC.
Attorneys At Law
P.O. Box 501856
Bank of Guam Bldg., 3rd Floor
Saipan, MP 96950
Tel: 670-233-5504/06
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

CIVIL ACTION NO. 05-0031

JUNG SOON LEE, (Deceased) By SUNG
YOUNG LEE, Personal Representative,

Plaintiff,

v.

DONG GUK CORPORATION,

Defendants.

PLAINTIFF'S RESPONSE TO DONG GUK
CORPORATION'S REQUEST FOR
ADMISSIONS

In response to Defendant's Request for Admission, Plaintiff responds as follows:

1. Jung Soon Lee knew Gyu Jin Kim was intoxicated immediately prior to the accident.
Deny.
2. Jung Soon Lee was a voluntary and willing passenger in the vehicle driven by Gyu Jin Kim at the time of the accident. Deny.
3. Jung Soon Lee knew Gyu Jin Kim was intoxicated when Jung Soon Lee voluntarily and willingly became a passenger in the vehicle driven by Gyu Jin Kim immediately prior to the accident. Deny.
4. Jung Soon Lee consumed alcohol after 2:00 a.m. on or about August 2, 2004. Admit.
5. Jung Soon Lee was intoxicated at the time of the accident. Admit.
6. On the night of the accident, Gyu Jin Kim consumed alcohol at business establishments

- 1 other than defendant's business establishment. Deny.
- 2 7. On the night of the accident, Jung Soon Lee consumed alcohol at business establishments
- 3 other than defendant's business establishment. Deny.
- 4 8. Defendant did not serve Gyu Jin Kim any alcoholic beverage after 2:00 a.m. on or about
- 5 August 2, 2004, the date of the accident. Deny.
- 6
- 7 9. Jung Soon Lee was not employed at the time of the accident. Deny.
- 8 10. Jung Soon Lee does not have any children. Admit.
- 9 11. Jung Soon Lee was not married at the time of the accident. Admit.
- 10 12. Jung Soon Lee was residing on Saipan at the time of the accident. Admit.
- 11 13. Gyu Jin Kim's intoxication was not the proximate cause of the accident. Deny.
- 12

13 Respectfully submitted this 17th day of November, 2006.

14 TORRES BROTHERS, LLC.

15 
16 /s/ Victorino DLG. Torres

17 VICTORINO DLG. TORRES, Bar No. F0253
18 Attorneys for Plaintiff, Mrs. Sablan

19 
20 /s/ Sung Young Lee

21 Personal Representative of Jung Soon Lee,
22 (deceased).

23 
24 Interpreter (English-Korean Language)

ACKNOWLEDGMENT

The foregoing answers to interrogatories were duly acknowledged before me this 17th day of November, 2006 by Sung Young Lee, in his capacity as personal representative of Jung Soon Lee, known to me or proven to me to be the same person who executed the foregoing document.

In witness whereof, I have hereunto set my hand and affixed my official seal on the date and year first above written.



[Handwritten Signature]

Notary Public

RALPH D.L.G. TORRES
Notary Public
Commonwealth of the Northern Mariana Islands
My Commission Expires: Apr 1, 2007
P.O. Box 501856
Saipan, MP 96950